

ANDREW O. ISAR



Via Electronic Comment Filing System and Overnight Delivery

March 20, 2019

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

ATTN: Consumer and Governmental Affairs Bureau

RE: *Structure and Practices of the Video Relay Service program, CG Docket No. 10-51: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123, Petition of ASL Services Holdings, LLC dba GlobalVRS on an Expedited Limited Waiver to Offer At-Home Interpreting Subject to the Conditions of the Pilot Program*

Dear Secretary Dortch:

ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS") hereby submits the attached *At Home VRS Call Handling Pilot Program Compliance Plan* ("Plan"). The Plan accompanies GlobalVRS's *Petition of ASL Services Holdings, LLC dba GlobalVRS on an Expedited Limited Waiver to Offer At-Home Interpreting Subject to the Conditions of the Pilot Program* submitted yesterday and establishes the manner in which GlobalVRS will comply with Commission regulations governing the At-Home VRS Call Handling Pilot Program.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in blue ink, appearing to read "Andrew O. Isar", is written over a horizontal line.

Andrew O. Isar

Consultants to  
ASL Services Holdings, LLC dba GlobalVRS

Attachment



# ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS  
3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

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## At-Home VRS Call Handling Pilot Program Compliance Plan

**Introduction.** ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS") appreciates the opportunity to participate in the Commission's At-Home VRS Call Handling Pilot Program ("Program"). This Program provides significant benefits to the public, while enhancing provider efficiency and maximizing opportunities for qualified video interpreters to provide valuable Video Relay Service ("VRS") interpretation, often under circumstances that might otherwise preclude their ability to serve.

GlobalVRS clearly recognizes the imperative for at-home VRS interpretation to be conducted and managed under the same regulatory, operational, and managerial framework under which GlobalVRS interpreters currently serve at the Company's call centers, if not more so. To that end, and pursuant to Section 64.604(b)(8) of the Commission's rules, 47 C.F.R. §64.604(b)(8), GlobalVRS submits this *At-Home VRS Call Handling Pilot Program Compliance Plan* ("Plan") for Commission approval. This Plan sets forth the detailed steps to be used by GlobalVRS in demonstrating GlobalVRS' efforts and intention to achieve compliance with the mandatory minimum standards applicable to VRS and with the safeguards enumerated in Section 64.604(b)(8) in the course participation in the At-Home VRS Call Handling Pilot Program.

**GlobalVRS Compliance with Mandatory Minimum Standards Pertaining to the Program.** The following constitutes GlobalVRS compliance with the specific requirements set forth in 47 C.F.R. §64.604(b)(8):

**1. A description of the screening process used to select CAs for the at-home call handling program (47 C.F.R. §64.604(b)(8)(i)(A)).**

Prospective at-home trial candidates will be subject to an extensive screening process conducted by a minimum of three managers, including one senior manager. Through the screening process, screeners will consider a number of factors. Individual screening process results will be documented and jointly reviewed by screeners. Candidate selection will require unanimous approval by the screeners and ultimate approval by the Executive team.

Among the key considerations to be made through the screening process are:

**Experience:** At minimum, the management screening team will ensure that each video interpreter seeking to participate in the at-home trial possesses meets the minimum experience and demonstrated professional standards for responsible at-home interpretation including, but not limited to demonstrated:

- professional experience, skills, and knowledge to effectively interpret from a workstations;
- thorough understanding of the TRS mandatory minimum standards;
- minimum of three years of experience as a call center interpreter; and
- ability to work independently.

1. **A description of the screening process used to select CAs for the at-home call handling program (47 C.F.R. §64.604(b)(8)(i)(A)), Continued**

Seniority, interpersonal skills, professionalism, past work performance inside a GlobalVRS call center, the demonstrated ability to work effectively remotely (remote video relay interpreting experience) and demonstrated experience in meeting confidentiality requirements will also be considered.

**On-Site Capabilities:** The management screening team will review each candidate's capability and physical location to ensure that the candidate is prepared to meet each of the physical requirements for remote interpreting including; a designated area with physical secure access, electricity, back up power, sufficient space, proper lighting, proper air flow and temperature and ability to have dedicated Internet/router, and agreement to have the at-home interpreting station accessible without notice to the Company and Commission representatives. Any work papers or notes must be placed in a locked desk inside the Work Room when the interpreter is not at work. Work-related computer(s) must be password protected and remotely accessible by GlobalVRS. The interpreter must maintain ready access to all documentation, escalation lists and other work aids that are otherwise required of interpreters located at a GlobalVRS call center. Please refer to additional considerations addressed in items 3 and 5.

Those candidates **who meet these key criteria for at-home interpreting** will then be evaluated in accordance with additional personal considerations including video relay interpreting (VRI) interpreters who are unable to work from a call center due to family caretaker responsibilities such as aging parents or special needs family members; those whose travel to call centers may be impeded at certain times of year due to weather; those who reside in remote areas who are otherwise precluded from commuting to a GlobalVRS call center; those with medical conditions that limit or preclude call center work and those with physical impairments including mobility.

Such individuals have a proven track record of stellar remote VRI performance. To the extent that such individuals can now be reassigned from VRI to VRS interpreting under an at-home trial, GlobalVRS will maximize the ability to enhance its interpreter pool and increase its efficiency.

Screening process documentation will be retained for a minimum of five years and be available to the Commission and/or its designated representatives, upon request.

2. **A description of specific training to be provided for at-home CAs (47 C.F.R. §64.604(b)(8)(i)(B)).**

GlobalVRS' general approach to prospective at-home Program interpreters will be consistent with its approach to current call center interpreters with additional specific training, overview of remote interpreting requirements and policies, and testing. Since only employees with three years or more experience will qualify for the trial, basic training, policy, and expectations of duties to perform as a VRS Interpreter have already been completed, although qualifying at-home interpreters will be subject to an additional "refresher" overview. Further, all interpreters including interpreters selected for at-home Program interpretation, will receive more detailed regulatory compliance training including detailed training on the Company's registration process international calling pre-registration and call procedures, time reporting procedures, and on regulatory compliance obligations generally. Employees who qualify for at-home Interpreting will be expected to perform the same interpreter functions and responsibilities as if they were sitting in their cubicle within the call center, albeit subject to the increased supervisory review.

Escalation processes will also remain unchanged from the interpreter's current procedures. The escalation form, available to all employees in all locations, is housed in the company extranet.

2. **A description of specific training to be provided for at-home CAs (47 C.F.R. §64.604(b)(8)(i)(B)).** Continued

When an at-home interpreter begins the trial, the contact information for the remote location will be updated with the contact information of the remote location consistent with the process for adding a new Interpreting center). Otherwise, normal escalation procedures will still apply in the event of power outage, internet outage, platform issue or another unforeseen emergency. Management will work with the CA as they would any other location experiencing an unforeseen event.

Communication will remain the same. Interpreting centers currently work together/communicate as a team on every shift by use of an online IM messaging system (SLACK). They also are available via telephone in case a verbal conversation is needed. Such communication tools will also be available in all at-home locations. As in the Interpreting center, ongoing communication throughout every shift (breaks, meals, personal needs) will be required.

GlobalVRS will further conduct focused training with selected at-home interpreters governing specific requirements applicable to at-home work areas, physical and electronic security of company issued equipment, Internet access outages, temperature settings, logical steps to ensure confidentiality in a remote location, training on white noise machines, basic troubleshooting of equipment and internet routers, lighting and adaptive camera settings, posting of key contacts/escalation procedure to easily reference in the event of an outage or emergency, and protection of Customer Proprietary Network Information. All selected interpreters will receive refresher briefings on previous instruction.)

3. **A description of the protocols and CA expectations developed for the at-home call handling program (47 C.F.R. §64.604(b)(8)(i)(C)).**

Interested at-home interpreting interpreters who believe they meet the minimum specified requirements will be required to submit an application in writing to Human Resources. Applications will include the applicant's video of the proposed work location, right of residence (e.g. lease, rental agreement, or title) for prescreening by the Company. Applicants that are confirmed to meet the minimum trial requirements by management and executive team will be subject to the screening process addressed in item 1, above. The results of this process will be documented, as noted.

During the initial screening process, the following will be reviewed:

**Right of Residence-** Interpreter candidates will be required to provide documented evidence that they have a right to reside in their residence to include leases, mortgages, *and* other evidence or residency such as a telephone or utility bill.

**Physical Work Location** - GlobalVRS will visually verify that the designated area is not a common area and is physically segregated as a designated work area – a physically secured and enclosed area specifically designated for interpreting that is not a shared room for other household functions). In this area GlobalVRS will review:

Secured Access - confirm process and expectations on how the room will stay secured (locked) access during shifts and not accessible by anyone other than the interpreter when not on duty.

3. **A description of the protocols and CA expectations developed for the at-home call handling program (47 C.F.R. §64.604(b)(8)(i)(C)).** Continued

White Noise Machines- confirm process and expectations on how the white noise machines will be used on every shift.

Temperature - confirm process and expectations on how the room will stay at an adequate temperature and ensure proper ventilation to perform duties.

Lighting- confirm existing lighting is sufficient or if additional lighting will be needed and expectations on how the room will ensure adequate lighting.

Furniture/Interpreting background - confirm if exiting furniture will be adequate or if additional items will be purchased/issued to ensure the location is a comfortable work environment. Measure signing space and dimensions of the Interpreting background that is required for Interpreting and verify via on camera test.

Equipment - confirm process and expectations on how the equipment will be positioned in the room. While normal CA functions will be performed, adaptive camera settings will be reviewed to ensure highest picture quality. CA will be responsible for the equipment and must attest in writing that it will not be used for personal use.

Escalation Procedures and Key Contacts will be required to be physically printed and hung in the work area. In the event of a power outage or internet outage lasting more than 15 minutes such resources would not be able to be accessed on the company's intranet. Having physical print-outs of escalation procedures and key contacts (GlobalVRS Information Technology support, supervisor, Internet Service Provider telephone number and account information, Power company telephone number and account information) will be required.

Please also refer to item 5, below.

**Internet Access and Verification** - The Company will coordinate with the interpreter's local Internet Services Provider to install dedicated, secure high-speed (broadband) Internet in the interpreter's at-home location at no cost to the interpreter. The Interpreter will be responsible for ensuring continued access to the internet and that associated equipment remains functional. In the event of an outage, the interpreter is responsible for immediately contacting a supervisor to initiate repair through the Internet Service Provider. The interpreter will be required to attest in writing that company issued internet access and associated equipment will not be used for personal/household use or by anyone else other than the designated interpreter.

**Dedicated Equipment and Verification** - The Company will provide and have installed dedicated computer equipment including a new computer, monitors, keyboard, mouse, and all software that is available to interpreters at call center locations, in the interpreter's at-home location at no cost to the interpreter (Also refer to item 5). This equipment shall be for exclusive use in the performance of the interpreter's at-home interpretation work. The Interpreter will be responsible for ensuring that all equipment remains in good working order. In the event of a malfunction, the interpreter is responsible for immediately contacting a supervisor to initiate repair. The interpreter will be required to attest in writing that company issued equipment will not be used for personal/household use.

**Procedures** - Call handling expectations will remain the same in an at-home interpreting environment as it would in an Interpreting Center. Access to the mandatory minimum standards, contact lists, training materials, whistleblower policies and other policies and additional references

3. **A description of the protocols and CA expectations developed for the at-home call handling program (47 C.F.R. §64.604(b)(8)(i)(C)).** Continued

are available via access to the Company's intranet and will be available to at-home interpreters via Company intranet access as well. Further, the at-home interpreter will be included in all team meetings via telephone or Internet conference access.

4. **A description of the grounds for dismissing a CA from the at-home program and the process for such termination in the event that the CA fails to adhere to applicable requirements (47 C.F.R. §64.604(b)(8)(i)(D)).**

GlobalVRS will immediately dismiss an at-home interpreter from the trial for any reason that the interpreter would otherwise be dismissed from employment including egregious violation of mandatory minimum standards and company policy. Additionally, GlobalVRS will dismiss at-home interpreters from the trial for the following reasons directly related to their ability to meet established expectations associated with the trial including:

**Breach of Secure Access Area** - The interpreter will be subject to immediate termination. if secure access to the designated work room and/or any confidential information, electronic or otherwise is breached, if the interpreter fails to maintain soundproofing, utilizes any electronic devices in the work room capable of recording and/or uses of any company provided equipment and Internet access for personal use or allow any other individual to do so,

**Electricity and Utilities** - Repeated electricity outages within the remote location whether due to external forces. If the local power company cannot consistently sustain power lines, then the location may be subject to disqualification from the trial. Should electricity or other utilities, not otherwise provided by GlobalVRS be temporarily discontinued due to non-payment the interpreter will be subject to immediate removal from the trial.

**Internet/Equipment Usage** - Should the interpreter use the dedicated company Internet and/or equipment for personal/household use of any kind or should the interpreter engage in any activity that interferes with company-provided equipment, software, and maintenance, the interpreter will be subject to immediate termination.

**Performance** - The interpreter's performance is reviewed and documented semi-annually based on a number of call processing statistics and direct supervisory observation. Semi-annual performance evaluations will be in addition to current annual performance evaluations. Should the interpreter's at-home interpreting productivity materially decline from the interpreter's prior productivity, the interpreter will be subject to increasing levels of disciplinary action (verbal warning, written warning, suspension) ultimately resulting in termination.

**Communications** - Should the at-home trial interpreter fail to communicate while on shift with other team members, immediately report any equipment malfunctions or events that limit/prohibit carrying out normal Interpreting duties, or otherwise meet assigned schedules, the interpreter will be subject to increasing levels of disciplinary action culminating in termination.

At-home interpreters will be provided with the specific conditions associated with their participation in the trial and process for removal from the trial and/or disciplinary action in writing subject to their acknowledgement in writing. Interpreters who are not prepared to acknowledge these conditions and process will not be allowed to participate in the trial.

The grounds and process for dismissing an At-Home CA from the Pilot Program will be provided in writing to the At-Home CA, as required by Section 64.604(b)(8)(iv)(D) of the Commission's rules.

4. **A description of the grounds for dismissing a CA from the at-home program and the process for such termination in the event that the CA fails to adhere to applicable requirements (47 C.F.R. §64.604(b)(8)(i)(D)).** Continued

Each At-Home CA will be required to certify in writing as to his or her understanding of the reasons and process for a dismissal from the Pilot Program, as required by Section 64.604(b)(8)(iv)(E) of the Commission's rules.

5. **A description of all steps that will be taken to install a workstation in a CA's home, including evaluations that will be performed to ensure all workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions (47 C.F.R. §64.604(b)(8)(i)(E)).**

The following workstation implementation and evaluation processes are being implemented to ensure workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions:

1. At-home interpreting trial applicants must first provide a brief description of their home location and working environment including a video of their proposed work location, and qualifications. This information will have a bearing on the applicant's selection.
2. Upon final selection, a thorough Company review of selected candidates' at-home location will be initiated. Reviews will include:

Physical Address and Right of Residence: to be verified through lease/utility bills (refer to item 3, above).

Workstation: Onsite visit and/or Video documentation of the remote location will be performed as outlined in item 3. No less than five percent (5%) of work location evaluations will be performed on site.

Internet and Equipment Installation: The Company's information technology manager will contact the local Internet service provider and order installation of business class internet with static IP address assigned to the location. A computer with all applicable software and peripheral equipment will be sent to the interpreter and assistance provided in setting up the equipment as needed. The Company will schedule testing with the interpreter and a final video inspection and check list review by one or more of the Company's managers before the interpreter's workstation is certified as ready to go on line. No interpreter will be allowed to initiate at-home interpretation until the interpreter's work location has been certified as compliant and fully operational.

3. Once the home location has been certified, the interpreter will be approved for at-home interpreting subject to company scheduling. Technical configurations will include:

**Internet:** Coordination to install internet to the location. Internet service provider account contracts will be in the company's name and invoiced to headquarters for payment.

**CenterID:** A center ID will be created by the Systems Administrator and added to the MMXPro Platform, CDR scripts and Monthly RL submissions.

**Regulatory Notification:** The Systems Administrator will then relay the new CenterID to the COO to coordinate substantial change notice to the Commission. Notification will also be provided to required monthly the Fund administrator submissions.

5. **A description of all steps that will be taken to install a workstation in a CA's home, including evaluations that will be performed to ensure all workstations are sufficiently secure and equipped to prevent eavesdropping and outside interruptions (47 C.F.R. §64.604(b)(8)(i)(E)).** Continued

**Router:** Router configurations to the platform and static IP address will be preset by the information technology team.

**Computer:** A personal computer will be designated to the remote location. A Company provided password will be assigned to the personal computer to ensure that the device is password protected. The interpreter to whom the device is assigned will be briefed on protection of the password to ensure it is not shared. Assigned computers will be loaded with Symantec Norton antivirus protection, Team Viewer Account, SLACK, GlobalVRS MMX Platform and company intranet shortcuts on the desktop. Google chrome will also be the designated internet browser.

**Supplemental Equipment will be assigned:** 2 Monitors, keyboard, mouse, webcam, speakers, amplifier, 2 headsets (one primary and one backup), power surge protector, foot stool, white board, markers, 2 Cat5 Ethernet cables (one primary and one backup), Interpreting backdrop and hardware to mount it, white noise player, additional lighting and Furniture (as needed).

Computer security will be ensured through use of separate, secured passwords for the Computer and separately for access to the MMXPro workstation platform. At-home interpreters will be required to log out at the end of each shift. Operations Coordinators/ Shift Managers will be able to monitor if the at-home interpreter is/isn't logged in at the appropriate times by watching the online queue. The online queue will show all Interpreters logged into the system, whether they are marked active/inactive, on a call or temporarily out. Failure to logout at the end of a shift will be identified by shift managers and they will be required to report if logins happen outside of scheduled shifts. Such escalation can result in coaching, written warning, verbal warning, suspension and/or termination for repeated violations.

Physical work locations will require the door to be internally locked to prevent unauthorized access or interruptions. Eavesdropping will not be tolerated in any form or fashion and subject to immediate termination if reported. Settings on the MMXPro workstations currently have all audio configured to go through interpreter headsets; speaker audio will be disabled. While speakers are part of the VRS station configuration, headsets are required on all calls. Additionally, current platform settings are enabled that if the initial invite from the videophone does not offer audio, then audio will not be negotiated. The Interpreter essentially communicates with the Deaf consumer in silence (if that is the preferred setting on the consumer's videophone) and the only auditory part of the conversation is from the Hearing party and voicing from the Interpreter. White noise machines will also be mandatory for all at-home locations for noise reduction and sound masking.

Test calls will be performed by the Systems Administrator/Operations Managers before the interpreter's work station is certified for use and periodically thereafter to verify that no external elements are causing any interference to a call. Individuals will be required to be hearing to perform this test.



**6. A description of the monitoring technology to be used by the provider to ensure that off-site supervision approximates the level of supervision at the provider's call center (47 C.F.R. §64.604(b)(8)(i)(F)).**

Monitoring technology that will be used to ensure offsite supervision will be primarily through the online Instant Messaging (IM) system called "SLACK" and the online Queue that shows all Interpreter activity.

SLACK enables all call centers (to include at-home workstations when on line) to communicate uniformly a one virtual center while the Interpreter shift. The SLACK system has been setup with credentials for each individual interpreter to communicate with any other Interpreter while on shift. It also allows for group messages to the entire team or ability to have private one on one conversations at will. Interpreters currently use SLACK for a host of reasons including but not limited to break/meal rotation notifications, communication about a call just prior to transfer, questions that might arise during a shift, communication if sick and need to log out and communications with supervisory staff. The Operations Coordinators and shift management monitor all communication on SLACK for all centers.

An online Queue called the Service Queue is available 24/7 and reflects all activity on the Platform. There is an administrative function through the Supervisor login and regular view through the Interpreter Login. Both queues show Interpreter login by a unique code given to each interpreter, if that Interpreter is available, temporary out or on an active call throughout the duration of the shift. It will show duration of time between calls and who is "next in line" to receive the next call. The queue is required to be displayed in all stations and is also prominently displayed in each center for supervisor observation and management. The Supervisor login allows for administrative work to be completed such as onboarding or removal of platform credentials, along with reporting capabilities. These reports are used to evaluate Interpreter productivity on each shift. At-home interpreter workstations will be integrated into the Service Queue as if in a call center, without distinction.

Additional methods to monitor the at-home workstation include TeamViewer which will allow third party supervisory access the computer to enable periodic monitoring of Interpreter activity. This function also will allow the information technologies staff to remotely access any workstation to perform troubleshooting and system performance analysis.

7. **An explanation of how the provider's workstations will connect to the provider's network, including how they will be integrated into the call center routing, distribution, tracking, and support systems, and how the provider will ensure system redundancy in the event of service disruptions in at-home workstations (47 C.F.R. §64.604(b)(8)(i)(G)).**

Each at-home interpreting work station will be connected to a Company- provided, dedicated, secure broadband Internet access line for connection to the Company's automatic call distribution system. This dedicated Internet line may be used only by the interpreter and only for use in connecting to the Company's platform. Once an Internet service provider has assigned a static IP address to the at-home interpreter's home, the Company's information technology team will configure the interpreter's router with the assigned static IP address. Concurrently, a CenterID will be created by the Systems Administrator and the static IP address will be added to the MMXPro administration portal allowing calls to be routed to the CA as if they were physically in a call center.

The MMXPro platform will also be configured to allow use of the assigned static IP address and confirm that it is coming from the approved remote location. The CenterID will then also be configured in the CDR scripts according to the CDR formatting requirement from the Fund administrator to track all components of the platform activity.

Interpreters will receive, utilize backup emergency power. Interpreters will also have a hard copy listing of all emergency contacts including power company, Internet service provider, and Company supervisory and IT support contacts. Should an at-home CA experience an unforeseeable outage and be unable to reestablish operations GlobalVRS call centers will seamlessly continue handling the call volume. The interpreter will be required to contact the Company within the 15-minute period regarding the outage, and will contact the Company periodically until the at-home work location is restored.

8. **A signed certification by an officer of the provider that the provider will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the pilot program (47 C.F.R. §64.604(b)(8)(i)(H)).**

Please **Attachment 1**. Senior managers have been briefed and are prepared to conduct random, unannounced inspections of at least five percent of all at-home workstations during the pilot program under a pre-established schedule to be prepared at the time at-home trial interpreter candidates have been selected.

9. **A commitment to comply with all other safeguards enumerated in this paragraph (b)(8) and the applicable rules in this chapter governing TRS (47 C.F.R. §64.604(b)(8)(i)(I)).**

GlobalVRS commits to comply with the safeguards set forth in Section 64.604(b)(8) and other requirements as may apply. The Company clearly recognizes the necessity for strict compliance generally, and to ensure that the at-home trial is successful. Part of the briefing to be given to at-home interpreters selected for the trial will include a discussion of the importance of strict compliance. GlobalVRS remains committed to its transparent compliance with all applicable Commission regulations and policies.

**GlobalVRS Acknowledgement of Additional Program Requirements as Set Forth in 47 C.F.R. §64.604(b)(8)(ii) Through (ix).**

GlobalVRS explicitly acknowledges its obligations to comply with the additional Program requirements as set forth in Section 64.604(b)(8)(ii) through (ix) of the Commission's rules as incorporated in this Plan, below.

**Authorization for at-home VRS call handling, 47 C.F.R. §64.604(b)(8)(ii).** Upon Commission approval of this Plan, GlobalVRS will conduct at-home VRS call handling inspections during the period of the Program. GlobalVRS acknowledges that the Commission may cancel approval of the Company's Plan and Program participation if GlobalVRS fails to comply with any of the safeguards enumerated below or other applicable mandatory minimum TRS standards. Further, GlobalVRS acknowledges that it may be subject to withholding, forfeitures, and penalties for noncompliant minutes handled by at-home workstations, as is the case for non-compliant minutes handled by call centers.

**Limit on minutes handled, 47 C.F.R. §64.604(b)(8)(iii).** GlobalVRS acknowledges that in any month of its Program participation GlobalVRS will be compensated for minutes served by at-home CA workstations up to a maximum of *either* thirty percent (30%) of GlobalVRS' total minutes for which compensation is paid in that month *or* thirty percent (30%) of the GlobalVRS' average monthly minutes for the 12 months ending October 31, 2017, whichever is greater.

**Personnel safeguards, 47 C.F.R. §64.604(b)(8)(iv).** Before permitting interpreters to handle VRS calls from at-home workstations, GlobalVRS shall perform the following functions in accordance with its plan, as noted.

(A) Ensure that each CA handling calls from an at-home workstation has the experience, skills, and knowledge necessary to effectively interpret from these workstations, including a thorough understanding of the TRS mandatory minimum standards and at least three years of experience as a call center CA. (please refer to Item 1, *supra*)

(B) Establish protocols for the handling of calls from at-home workstations (to the extent there are additional protocols that differ from those applicable to the provider's call centers) and provide training to at-home CAs on such protocols, in addition to all applicable training that is required of CAs working from call centers. (please refer to Items 2 and 3, *supra*)

(C) Provide each CA working from an at-home workstation equivalent support to that provided to CAs working from call centers, as needed to effectively handle calls, including, where appropriate, the opportunity to team interpret and consult with supervisors, and ensure that supervisors are readily available to a CA working from home to resolve problems that may arise during a relay call, such as difficulty in understanding a VRS user's signs, the need for added support for emergency calls, and relieving a CA in the event of the CA's sudden illness. (please refer to Items 2 and 3, *supra*)

(D) Establish grounds for dismissing a CA from the at-home VRS call handling program (*i.e.*, for noncompliance with the standards and safeguards enumerated in this paragraph (b)(8) and the rules governing TRS), including a process for such termination in the event that the CA fails to adhere to these requirements, and provide such grounds and process in writing to each CA participating in the pilot program. (please refer to Item 4, *supra*)

(E) Obtain from each CA handling calls from an at-home workstation a certification in writing of the CA's understanding of and commitment to complying with the rules in this chapter governing TRS, including rules governing caller confidentiality and fraud prevention, and the CA's understanding of the reasons and process for dismissal from the at-home VRS call handling program.

**GlobalVRS Acknowledgement of Additional Program Requirements as Set Forth in 47 C.F.R. §64.604(b)(8)(ii) Through (ix).** Continued

**Technical and environmental safeguards, 47 C.F.R. §64.604(b)(8)(v).** GlobalVRS shall ensure that each home environment used for at-home VRS call handling enables the provision of confidential and uninterrupted services to the same extent as the provider's call centers and is seamlessly integrated into the provider's call routing, distribution, tracking, and support systems. VRS providers shall ensure that each at-home workstation: (please refer generally to Item 3, *supra*)

(A) Resides in a separate, secure location in the CA's home, where access is restricted solely to the CA (please refer to Item 1, *supra*);

(B) Allows a CA to use all call-handling technology to the same extent as other CAs, including the ability to transition a non-emergency call to an emergency call, engage in virtual teaming with another CA, and allow supervisors to communicate with and oversee calls (please refer to Item 2, *supra*);

(C) Is capable of supporting VRS in compliance with the applicable mandatory minimum technical and emergency call handling standards to the same degree as these are available at call centers, including the ability to route VRS calls around individual CA workstations in the event the CA experiences a network outage or other service interruption (please refer to Item 1, *supra*);

(D) Is equipped with an effective means to prevent eavesdropping, such as white noise emitters or soundproofing, and to ensure that interruptions from noises outside the room do not adversely affect a CA's ability to interpret a call accurately and effectively (please refer to Item 3, *supra*); and

(E) Is connected to the provider's network over a secure connection to ensure caller privacy (please refer to Items 3 and 5, *supra*; GlobalVRS will provide dedicated secure Internet access and equipment).

**Monitoring and oversight obligations, 47 C.F.R. §64.604(b)(8)(vi).** GlobalVRS shall:

(A) Inspect and approve each at-home workstation before activating a CA's workstation for use (please refer to Item 1, *supra*);

(B) Assign a unique call center identification number (ID) to each VRS at-home workstation and use this call center ID to identify all minutes handled from each such workstation in its call detail records submitted monthly to the TRS Fund administrator;

(C) Equip each at-home workstation with monitoring technology sufficient to ensure that off-site supervision approximates the level of supervision at the provider's call center, including the ability to monitor both ends of a call, *i.e.*, video and audio, to the same extent as is possible in a call center, and regularly analyze the records and data produced by such monitoring to proactively address possible waste, fraud, and abuse;

(D) Keep all records pertaining to at-home workstations, including the data produced by any at-home workstation monitoring technology, except for any data that records the content of an interpreted conversation, for a minimum of five years; and

(E) Conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the pilot program. (please refer to Item 8, *supra*)

**GlobalVRS Acknowledgement of Additional Program Requirements as Set Forth in 47 C.F.R. §64.604(b)(8)(ii) Through (ix).** Continued

**Commission audits and inspections, 47 C.F.R. §64.604(b)(8)(vii).** At-home workstations and workstation records shall be subject to review, audit, and inspection by the Commission and the Fund administrator and unannounced on-site inspections by the Commission to the same extent as other call centers and call center records subject to the rules in this chapter. Selected At-Home trial interpreters must affirmatively agree in writing to *ad hoc*, unannounced Commission, Fund administrator and Company onsite location reviews, audits, and inspections as a pre-condition for participate in the At-Home interpreting trial.

**Reporting 47 C.F.R. §64.604(b)(8)(viii) and (ix).** GlobalVRS is coordinating with the Fund administrator to provide trial reports in accordance with the monthly and six month reporting requirements set forth by the Commission.

**Monthly reports, 47 C.F.R. §64.604(b)(8)(viii).** GlobalVRS shall report the following information to the TRS Fund administrator with its monthly requests for compensation:

(A) The call center ID and full street address (number, street, city, state, and zip code) for each at-home workstation and the CA ID number for each individual handling VRS calls from that workstation; and

(B) The location and call center IDs of call centers providing supervision for at-home workstations, plus the names of persons at such call centers responsible for oversight of such workstations.

**Six-month report, 47 C.F.R. §64.604(b)(8)(ix).** GlobalVRS shall submit, no later than seven months after the start of its program, a report covering the first six months of its program, containing the following information:

(A) A description of the actual screening process used to select CAs for the at-home call handling program;

(B) Copies of training materials provided to at-home CAs;

(C) Copies of written protocols used for CAs working from home;

(D) The total number of CAs handling VRS calls from at-home workstations over the first six months of the program;

(E) The number of 911 calls handled by the provider's at-home workstations;

(F) A description and copies of any surveys or evaluations taken of CAs concerning their experience using at-home workstations and participating in an at-home call handling program;

(G) The total number of CAs terminated from the program;

(H) The total number of complaints, if any, submitted to the provider regarding its at-home call handling program or calls handled by at-home CAs;

(I) The total number of on-site inspections conducted of at-home workstations and the date and location of each inspection;

**GlobalVRS Acknowledgement of Additional Program Requirements as Set Forth in 47 C.F.R. §64.604(b)(8)(ii) Through (ix). Continued**

**Six-month report, 47 C.F.R. §64.604(b)(8)(ix). Continued**

(J) A description of the monitoring technology used to monitor CAs working at home and an analysis of the experience of supervisors overseeing at-home CAs compared to overseeing CAs in a call center;

(K) Copies of any reports produced by tracking software and a description explaining how the provider analyzed the reports for anomalies; and

(L) Detailed documentation of costs incurred in the use of at-home workstations, including any costs associated with CA recruitment, training, and compensation, engineering and technical set-up (including workstation set-up), and administrative and management support (including oversight, evaluation, and recording).

**Designated Contacts.** GlobalVRS has designated the following individual as At-Home VRS Call Handling Pilot Program Contact. Selected At-Home program interpreters will be provided with all supervisory contacts.

Program Contact

Gabrielle Joseph  
Chief Operations Officer  
3700 Commerce Boulevard  
Kissimmee, FL 34741  
Telephone: (407) 518-7900  
Email: Gabrielle@aslservices.com

**ATTACHMENT 1**

Certification of Random and Unannounced Inspections  
of at Least Five Percent of all  
At-Home Workstations During the Pilot Program

(Attached)

STATE OF FLORIDA  
COUNTY OF OSCEOLA

)  
) ss.  
)

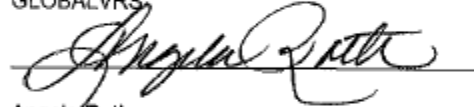
CERTIFICATION

I, Angela Roth do hereby declare under penalty of perjury that I am President and Chief Executive Officer of ASL Services Holdings, LLC dba GlobalVRS ("GlobalVRS") and authorized to make this certification.

I hereby declare and certify under penalty of perjury that a designated senior GlobalVRS manager will conduct random and unannounced inspections of at least five percent (5%) of all at-home workstations during the At-Home VRS Call Handling Pilot Program as set forth in section 64.604(b)(8)(i)(H), 47 C.F.R. §64.604(b)(8)(i)(H), and that GlobalVRS will take such action as necessary to ensure an maintain ongoing compliance.


Executed this 20th day of March, 2019,

ASL SERVICES HOLDINGS, LLC dba  
GLOBALVRS



Angela Roth  
President and Chief Executive Officer  
3700 Commerce Boulevard, Suite 216  
Kissimmee, Florida 34741  
Telephone: 407.518.7900

Subscribed to me this 20th day of March, 2019,

  
Notary Public  
My commission expires Aug 9, 2022

SEAL

